

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ALAN GOLDMAN,	* CIVIL NO.: 24cv01136
Plaintiff	*
v.	*
McCONNELL VALDÉS, LLC;	*
ANTONIO A. ARIAS-LARCADA, his wife	*
MARIA BEALE, and the Conjugal	*
JOHN DOE; MARY DOE	*
SOMPO INTERNATIONAL INSURANCE	*
COMPANY; ENDURANCE AMERICAN	*
SPECIALTY INSURANCE COMPANY;	*
AIG INTERNATIONAL COMPANY-PUERTO RICO	*
Defendants	*

EXHIBIT 2

AFFIDAVIT
ANTHONY N.L. IAPARRINO, ESQ.

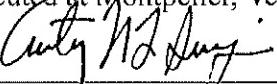
Declaration of Anthony N.L. Iarrapino, Esq.

1. I am an attorney at the Montpelier, Vermont law firm of Wilschek Iarrapino Law Office, PLLC.
2. I am admitted to practice law, among other places, in the State of Vermont and before the Federal District Court for the District of Vermont.
3. On April 16, 2025, Mr. Alan Goldman retained me and my law firm to represent him and his interests in advancing housing development in the City of Montpelier, Vermont.
4. Mr. Goldman is the owner of two of the largest undeveloped land parcels within the City of Montpelier's legally-designated Growth Center: the Sabin's Pasture parcel (approximately 95 acres) and the Crestview parcel (approximately 519 acres). Together, these properties represent over 600 acres of land. They are considered by many, myself included, to be essential to Montpelier's future housing growth, open space, and recreational planning.
5. As part of my representation of Mr. Goldman, I have been advising him on how to constructively engage with our City's ongoing process to amend its master plan consistent with Vermont law, 24 V.S.A. §§ 4384-8485.
6. Once finally adopted, the City's master plan will be consulted by permitting authorities with jurisdiction over Mr. Goldman's parcels. Moreover, the amended master plan will also influence whether and how the City's zoning ordinance will be rewritten to advance the master plan's objectives. Thus, the master plan amendment has potential direct and secondary impacts on the viability of housing and other development on Mr. Goldman's parcels.
7. Mr. Goldman has participated actively in the ongoing master plan amendment process. Since retaining me, we have consulted on several occasions regarding how best Mr. Goldman can further engage the process substantively and stylistically to increase the chances of a favorable outcome for the community and the role his planned development can play in achieving those outcomes.
8. By law, the next and final step in the master plan amendment process is adoption by the Montpelier City Council. Prior to adoption, the Council must hold two public hearings where stakeholders like Mr. Goldman can present his views on the plan to the City Council and can engage with the views of others, including the many stakeholders who have opinions about whether and how Mr. Goldman's parcels can or should be developed to meet the City's housing needs.
9. The City has scheduled the two mandatory public hearings for May 21, 2025 at 6:30 p.m. and May 28, 2025 at 6:30 p.m. at the Montpelier Senior Center.

10. While both meetings will be broadcast live on YouTube and remote participation is available via Zoom, I have advised Mr. Goldman that his in-person attendance at these meetings is strongly preferable to appearance via Zoom.
11. My advice is based on my understanding of and feel for the dynamics of the community in what is essentially a small town of less than 10,000 residents. In my more than twenty years' of experience engaging with Montpelier's city government, local decision-makers respond best to comments made by those who appear in person at the hearings which are also attended in person by the City Councilors.
12. Moreover, his appearance in-person will enable much easier real-time coordination between Mr. Goldman and me, his attorney, when it comes to whether and how to respond to comments made by City Councilors, planning officials, and members of the public concerning his properties.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Montpelier, Vermont on May 5, 2025 by:



Anthony Iarrapino, Esq.
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